

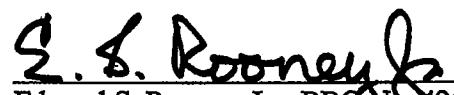
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,)
)
 Plaintiff,)
v.)
) CIVIL ACTION NO:
BLUE CROSS BLUE SHIELD OF) NO: 05-CV-10448-GAO
MASSACHUSETTS, INC., BLUE CROSS)
BLUE SHIELD LONG-TERM)
DISABILITY BENEFIT PLAN, a/k/a)
OMNIBUS WELFARE BENEFITS)
PLAN, KEMPER NATIONAL)
SERVICES, INC., BROADSPIRE)
SERVICES, INC., AND SHELDON)
MYERSON, MD.,)
)
 Defendants.)
)

LOCAL RULE 16.1 (D) (3) CERTIFICATION

The undersigned, as counsel for defendant Kemper National Services, Inc., and as an authorized representative of said defendant, hereby certify that we have conferred with respect to establishing a budget for the cost of conducting the full course, and various alternative courses, of the litigation and have considered resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.


Eric Myers


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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by ~~regular mail, postage prepaid~~, this 15th day of November, 2005.

HAND DELIVERY

S. S. Rooney Jr.
Edward S. Rooney Jr.